


B1040 (FORM 1040) (12/15)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)		
PLAINTIFFS <i>Larry Kushner/Kaczynski E</i>	DEFENDANTS <i>H5BC, Trustee</i> <i>Specialize Loan Services LLC</i>			
ATTORNEYS (Firm Name, Address, and Telephone No.) <i>Larry Kushner pro se</i> <i>731 Grand Ave</i> <i>LB NJ 07740</i>	ATTORNEYS (If Known)			
PARTY (Check One Box Only) <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee			
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) <i>Vacate Lien + Judgment</i> <i>Declaratory Relief</i> <i>Money Damages</i>				
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)				
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input checked="" type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input checked="" type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny (continued next column) </td> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa et seq. <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case) </td> </tr> </table>			FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input checked="" type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input checked="" type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny (continued next column)	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input checked="" type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa et seq. <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
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<input type="checkbox"/> Check if this case involves a substantive issue of state law	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23			
<input type="checkbox"/> Check if a jury trial is demanded in complaint	Demand \$			
Other Relief Sought				

2019 JUN 25 PM 3:06
 JEFFREY A. BAUGH
 CLERK
 U.S. BANKRUPTCY COURT
 MERIDEN, NJ

B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR <i>Harry Kushner Jagolis Kushner</i>	BANKRUPTCY CASE NO. <i>18-33285</i>	
DISTRICT IN WHICH CASE IS PENDING <i>N.D. - Trenton</i>	DIVISION OFFICE	NAME OF JUDGE <i>Graville</i>
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF) 		
DATE <i>6/25/19</i>	PRINT NAME OF ATTORNEY (OR PLAINTIFF) <i>Harry Kushner</i>	

INSTRUCTIONS

The filing of a bankruptcy case creates an "estate" under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor's discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court's Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff's attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

Plaintiffs and Defendants. Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

Attorneys. Give the names and addresses of the attorneys, if known.

Party. Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

Demand. Enter the dollar amount being demanded in the complaint.

Signature. This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

Submitted by
Larry Kushner
Debtor pro-se
Larry.Kushner@gmail.com
(732) 670-6703

Jacqueline Kushner
Debtor pro-se
momkush@gmail.com
(732) 670-4277

U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ

2019 JUN 25 P 2:26

JEANNE A. NAUGHTON

BY: Bj.
DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY
402 East State Street
Trenton, NJ 08608

**IN RE: JACQUELINE KUSHNER
AND LARRY J. KUSHNER**

CASE NO. 18-33285-CMG
CHAPTER 13
Judge Christine M. Gravelle

Soc. Sec. No. xxx-xx-5868
xxx-xx-5977

LARRY KUSHNER,
JACQUELINE KUSHNER

DEBTORS-PLAINTIFFS

ADVERSARY PROC.
DKT # _____

V.

HSBC BANK USA, AS TRUSTEE
SPECIALIZED LOAN SERVICING (SLS)

DEFENDANTS

COMPLAINT-ADVERSARY PROCEEDING

The Debtors, Jacqueline Kushner and Larry J. Kushner, in this Case hereby file this Complaint against the defendants named herein and allege as follow:

1. Debtors are husband and wife and filed this Petition on 11/27/18.
2. Debtors own their principal residence at 731 Greens Ave, Long Branch, NJ
3. Debtors home at 731 Greens Ave, Long Branch is property of the Estate.
4. Defendant HSBC BANK USA, trustee (hereinafter referred to as HSBC) is a bank and alleged holder of the 1st mortgage and lost note.
5. HSBC alleges to hold a first mortgage on the debtor's residence.
6. HSBC hold a fraudulent or improperly obtained judgement against the debtor filed against their real estate at 731 Greens Ave, under dkt number F-030194-08.
7. Defendant Specialized Loan Services (SLS) is the "servicer" of defendant HSBC's mortgage on debtor residence.
8. Defendant SLS filed a proof of claim in this matter on 2/4/19 under claim #24-1 alleging under oath that they are owed money under this mortgage. Attached is a copy of that filed proof of claim as Exhibit A.
9. Defendant HSBC filed a proof of claim in this matter on 2/4/19 under claim # 24-1 alleging under oath that they are owed money under this mortgage. (Exhibit A)

10. Defendant HSBC thru counsel on January 31, 2019 filed as DKT entry 43 objections to debtors first plan and again stated that this claim was on a mortgage for money due. Attached is a copy as Exhibit B.
11. Defendant SLS sent by its subsidiary a letter to defendants offering loss mitigation services.
12. Debtors responded to defendants offer (point 11 above) on January 31, 2019 accepting their offer for loss mitigation services. Attached as Exhibit C is a copy of the acceptance and proof of return via fax)
13. Defendants have engaged the services of United Equities to mitigate this claim and keep or short sale this home.
14. Defendants have refused to respond or negotiate with the debtor's agent.
15. The proof of claim filed by the defendant's states that the claim is based upon a mortgage and a "*lost note*". (See Exhibit D)
16. The alleged judgement in New jersey Superior Court is based on a representation of having the Note.
17. The judgement is therefore fraudulently obtained and should be given no recognition in this Court if it was fraudulently obtained.
18. The defendant's claim that the property was sold should be given no credence or enforced since it violates the claims made in this court under oath (Dkt entry 43-1 and proof of claim 24-1)
19. Attached is a copy of that filed proof of claim showing that the note is lost and claiming money under the mortgage not any alleged sale. (Exhibit E).
20. During this pending proceeding defendant SLS sent debtors notices of changes in interest rate (Exhibit F).
21. During this pending proceeding defendant sent debtors

notices of changes in the amount of the mortgage payment (Exhibit G).

JURISDICTION AND VENUE

22. This Court has jurisdiction over this case founded on 28 USC Section 1354 or under USC Section 1334 (a) or in the alternative arising under the Bankruptcy Code or arising in or related to a Case under the Bankruptcy Code and because the District Court of this District has by Order pursuant to 28 USC Sec. 157 (a) referred all such cases and Civil proceedings to the Bankruptcy Judges of this District.
23. This is a core proceeding within the meaning of 28 USC 157 in that it is a matter concerning the administration of the Estate, seeks to determine or avoid a lien or judgement, arises or effects this Bankruptcy estate or the adjustment of the debtor creditor relationship.
24. To the extent that it is determined that this matter or any claim asserted in this matter is non-core then Plaintiff-debtor consents to the entry of a Final Order or judgement by this Court,
25. Venue Lies in this Court pursuant to 28 USC 1409 (a) because this is the Court in which debtor's bankruptcy case is pending.

FIRST REQUEST FOR RELIEF

26. Debtors repeat, reiterate and emphasize paragraphs above as they apply to this cause of action.
27. The defendants conduct in this proceeding as enumerated herein constitute a waiver of any claim that the premises was sold.
28. The defendants filing a proof of claim seeking a claim on the mortgage and acknowledging the existence of the mortgage constitutes a bar, waiver or laches on any claim that the

premises were sold at action.

29. Defendants actions including the change in the payment amount and change in interest rate act as a bar and they should be estopped from claiming this mortgage has been sold or is no longer in effect.
30. The defendants have waived any claim the premises were sold.
31. The defendants are barred claiming the property was sold.
32. That the alleged sale of the premises should be vacated and declared a nullity.
33. By reasons of the foregoing plaintiff is entitled to a judgement vacating any sale of the property that the defendant alleges.
34. By reason of the foregoing plaintiff seeks a judgment vacating the lien and judgement on these premises.
35. By reason of the foregoing plaintiff seeks a judgement confirming the mortgage is still in place.

SECOND REQUEST FOR RELIEF

36. The defendant repeats the allegations above in full above.
37. The proof of claim filed herein alleges that the note underlying this claim was lost.
38. Attached to the proof of claim is a lost note affidavit.
39. The alleged judgement in State court is founded on the note.
40. If the note is lost the State Court judgement is based on a fraudulent or mistaken fact and should be given no validity.
41. Thus, the alleged judgement of foreclosure must be

vacated or removed as a lien on this property.

42. That the debtor is entitled to an Order removing this judgement as a lien on the property.

THIRD REQUEST FOR RELIEF

43. The debtor repeats the operative allegations above.
44. The defendants by their conduct lured the debtors into negotiating in good faith which the defendants failed to do,
45. The debtors may have given up rights based upon the defendants conduct.
46. The defendants made those representations intending to seek reliance by the debtors.
47. The debtors in fact relied on those representations.
48. The defendants acts and representations were false or misleading when made.
49. The debtors have been damaged to extent of one million dollars (1,000,000).
50. The debtors are entitled to a judgement against these defendants in the amount of \$1,000,000.

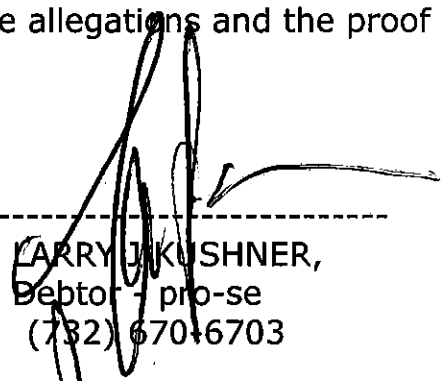
FOURTH REQUEST FOR RELIEF

51. Debtor repeats the allegations above.
52. Debtor seeks such other and further relief that the allegations herein and the proof adduced will entitle them to, including the money damages set forth above and the striking of the judgement.


WHEREFORE, PLAINTIFF DEBTOR seeks a judgement:

1. Striking the judgement and lien on 731 Greens Ave, Long Branch, Nj and
2. Ordering the alleged sale of the property a nullity; and
3. Reinstating the mortgage on the premises; and
4. Awarding the Plaintiff 1 million dollars in damages; and
5. For such other relief as these allegations and the proof supports.

June 19, 2019



LARRY J. KUSHNER,
Debtor - pro-se
(732) 670-6703



JACQUELINE KUSHNER,
Debtor - pro-se
(732) 670-4277

Fill in this information to identify the case:

Debtor 1 Larry J. Kushner
Debtor 2 Jacqueline Kushner
(Spouse, if filing)
United States Bankruptcy Court for the: _____ District of New Jersey
(State)
Case number 18-33285-CMG

Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 357 1.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	HSBC Bank USA, National Association, as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE1 Asset Backed Pass-Through Certificates Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor <u>C/O Specialized Loan Servicing LLC</u>	
2. Has this claim been acquired from someone else?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. From whom? <u>Wells Fargo Home Mortgage</u>	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Specialized Loan Servicing LLC Name 8742 Lucent Blvd, Suite 300 Number Street Highlands Ranch, Colorado 80129 City State ZIP Code Contact phone <u>(800) 315-4757</u> Contact email _____ Uniform claim Identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) Specialized Loan Servicing, LLC Name PO Box 636007 Number Street Littleton, Colorado 80163 City State ZIP Code Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Exhibit
A

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6.	Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>5749</u>
7.	How much is the claim?	<u>\$1,376,336.49</u> Does this amount include interest or other charges? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8.	What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information. <u>Money Loaned</u>
9.	Is all or part of the claim secured?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of Property: <input checked="" type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: <u>731 Greens Ave, Long Branch, New Jersey 07740</u> Basis for Perfection: <u>Recordation of Lien</u> Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured: <u>\$1,376,336.49</u> Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the date of the petition: <u>\$874,815.52</u> Annual Interest Rate (when case was filed) <u>9.000000%</u> <input type="checkbox"/> Fixed <input checked="" type="checkbox"/> Variable
10.	Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
11.	Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No
☐ Yes. Check one:

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
<input type="checkbox"/> Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$ _____

* Amounts are subject to adjustment on 04/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 6005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☒ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 02/04/2019
MM / DD / YYYY

/s/ Natalie E. Lea
Signature

Print the name of the person who is completing and signing this claim:

Name Natalie E. Lea
First name Middle name Last name

Title Authorized Agent for Specialized Loan Servicing, LLC

Company Bonlai & Associates, P.C.
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address P.O. Box 9013
Number Street

Addison Texas 76001
City State ZIP Code

Contact phone (972) 643-6600 Email POCInquiries@BonlaiPC.com

Fill in this information to identify the case:			
Debtor 1	Larry J. Kushner		
Debtor 2 (Spouse, if filing)	Jacqueline Kushner		
United States Bankruptcy Court for the:		District of	New Jersey (State)
Case number	18-33285-CMG		

Mortgage Proof of Claim Attachment: Addendum

Additional Claim Itemization:

Loan History Date	Actual Date Incurred	Description	Amount
1/2/2019	11/14/2018	Foreclosure Attorney Fee	\$747.50

POC Special Language:

Specialized Loan Servicing, LLC services the loan on the property referenced in this proof of claim. In the event the automatic stay in this case is modified, this case dismisses, and /or the debtor obtains a discharge and a foreclosure action is commence on the mortgaged property, the foreclosure will be conducted in the name of HSBC Bank USA, National Association, as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE1 Asset Backed Pass-Through Certificates , "NOTEHOLDER". **Noteholder is unable to find the promissory note and will seek to prove the promissory note using a lost note affidavit. Noteholder is the original mortgagee or beneficiary or the assignee of the security instrument for the referenced loan.**

Denise Carlon, ESQUIRE
KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108
(215) 627-1322

Attorneys for Specialized Loan Servicing LLC as servicer for HSBC Bank USA, National Association, as Trustee
for ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE1 Asset Backed Pass- Through Certificates

IN THE MATTER OF:

Jacqueline Kushner
Larry J. Kushner

DEBTOR(S),

IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY

CHAPTER 13
CASE NO. 18-33285 CMG

NOTICE OF OBJECTION

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Specialized Loan Servicing LLC as servicer for HSBC Bank USA, National Association, as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE1 Asset Backed Pass- Through Certificates**, the holder of a Mortgage on the debtors' premises at **731 Greens Avenue Long Beach, NJ 07740** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. The claims bar date is February 05, 2019. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$852,288.90.

2. Debtor's plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.

3. The Debtor's proposed plan calls for the refinance of premises at which refinance provision does not satisfy the feasibility requirements of 11 U.S.C. 1325(a)(6) in that the debtor(s) show(s) no proof of value and further does/do not evidence how much is being paid to the Secured Creditor through the plan.

4. The Debtor's plan does not indicate a time frame within which the Debtor's property will be sold and whether the Debtor(s) will continue to make the monthly mortgage payments outside the Chapter 13 plan.

5. The Debtor's proposed plan calls for the sale or refinance of the aforesaid premises, which sale provision does not satisfy the feasibility requirements of 11 U.S.C. 1325 (a) (6). The sale or refinance of the property on or before is remote and speculative and therefore the plan is not feasible.

Exhibit
B

6. The plan indicates that the claim of the secured creditor will be paid in full through the Chapter 13 plan by a sale or refinance of its collateral. Any payoff of the Secured Creditor's claim must be calculated according to New Jersey state law. See 11 U.S.C 1325(a)(5)(B)(I)(aa).

7. Debtors' plan apparently provides for sale, refinance, short sale, and modification of the subject claim. Because the treatment is not clear, the plan does not meet the feasibility requirements of 11 U.S.C. 1325(a)(6).

8. The Secured Creditor's security interest is not adequately protected during the life of the Debtor's plan. The monthly mortgage payment is \$. However, the Debtor proposes to make adequate protection payments of only per month. The Debtor does not propose to make full payments in accordance with the terms of the note and mortgage in violation of 11 U.S.C.1322 (b) (2).

9. Debtor's Plan understates the amount of the Secured Creditor's claim by \$852,288.90, and does not provide sufficient funding to pay said claim.

10. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.

11. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire
Attorney for Specialized Loan Servicing LLC as servicer for
HSBC Bank USA, National Association, as Trustee for ACE
Securities Corp. Home Equity Loan Trust, Series 2006-HE1
Asset Backed Pass- Through Certificates

Dated: JANUARY 31, 2019

HP LaserJet M1536dnf MFP

Fax Confirmation

HP Fax

Mar-1-2019 12:52PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
1495	3/ 1/2019	12:49:09PM	Send	*41,....759909917202	3:28	3	OK

Jacqueline Kushner,
731 Greens Ave
Long Branch, NJ 07740
732-670-4277

February 28, 2019

National Bankruptcy Services, LLC
14841 DALLAS PARKWAY SUITE 300
DALLAS, TEXAS 75254
VIA EMAIL AND FAX TO (720)241-7218

RE: YOUR FILE # 4128-N-1130
JACQUELINE KUSHNER
731 GREENS AVE, LONG BRANCH, NJ 07740
BANKRUPTCY 3 18-33285
LOSS MITIGATION

Dear Sirs:

I am in receipt of your letter dated 1/30/19 offering loss mitigation options on this premises.

I wish to take you up on that offer and am submitting under separate cover the "package" you requested.
Attached to this letter is the signed authorization regarding the bankruptcy. Also attached is the cover page of the package to show my intent.

Please note that I have called your office and placed my husband, Larry Kushner, on this account so you can talk with him.

Please acknowledge receipt and advise me what else is required.

Very truly yours,

Jacqueline Kushner

Exhibit
= C

Jacqueline Kushner,
731 Greens Ave
Long Branch, NJ 07740
732-670-4277

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Please acknowledge receipt and advise me what else is required.

Very truly yours,

Jacqueline Kushner

REQUEST FOR MORTGAGE ASSISTANCE

Specialized Loan
Servicing

Part of the Computershare Group

SLS Loan Number: _____

If you are experiencing a financial hardship and need help, you must complete and submit this form along with other required documentation to be considered. You must provide information about yourself and your intentions to either keep or transition out of your property; a description of the hardship that prevents you from paying your mortgage(s); information about all of your income, expenses and financial assets; whether you have declared bankruptcy; and information about the mortgage(s) on your principal residence and other single family real estate that you own. When you sign and date this form, you will make important certifications, representations and agreements, including certifying that all of the information in this form is accurate and truthful.

On this page, you must disclose information about your intentions to either keep or transition out of your home; Primary Borrower and Co-Borrower information; Bankruptcy, SCRA, and credit counseling agency information.

SECTION 1: PROPERTY INFORMATION

My intent with the property is: ☒ Keep the property ☐ Sell the property ☐ Deed the property back ☒ Short payoff ☒ I don't know

NOTE: SLS will perform an evaluation to determine your eligibility for all available programs offered by your investor.

The property is currently: ☒ My primary residence ☐ A second home ☐ An investment property

The property is currently: ☒ Owner occupied ☐ Renter occupied ☐ Vacant

Do you have a change in circumstance resulting from an increase or decrease in compensation? ☐ No ☒ Yes

SECTION 2: BORROWER INFORMATION

Primary Borrower		Co-Borrower	
Borrower's name <u>Jacqueline Kushner</u>		Co-Borrower's name <u>Larry Kushner</u>	
Social security number <u>103-62-5968</u>	Date of birth <u>2 / 7 / 65</u>	Social security number <u>058-44-5977</u>	Date of birth <u>12 / 6 / 51</u>
Home phone number with area code <u>(732) 963-9590</u>		Home phone number with area code <u>(732) 670-6703</u>	
Cell or work number with area code <u>(732) 670-4277</u>		Cell or work number with area code <u>(732) 670-6703</u>	
Subject property address (Address requesting assistance for) <u>731 Greens Ave LB NJ</u>		Subject property address (Address requesting assistance for) <u>731 Greens Ave LB NJ</u>	
Primary residence address <u>Same</u>		Primary residence address <u>731 Greens Ave LB NJ</u>	
Mailing address (if different than primary residence) <u>Same</u>		Mailing address (if different than primary residence) <u>Same</u>	
Employer name <u>Unemployed - Housewife</u>		Employer name <u>Unemployed</u>	
Borrower hire date <u>/ /</u>		Co-Borrower hire date <u>/ /</u>	

SECTION 3: BANKRUPTCY, SCRA, AND CREDIT COUNSELING

Has any Borrower filed for bankruptcy? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Chapter 7 <input type="checkbox"/> Chapter 11 <input type="checkbox"/> Chapter 12 <input checked="" type="checkbox"/> Chapter 13	Is any Borrower a Service member? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Filing date: <u>11 / 27 / 19</u> Case Number: <u>18-33285</u>	Is any Borrower receiving hostile pay? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has your bankruptcy been discharged? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Have you recently been deployed away from your principal residence or recently received a permanent change of station order? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Have you contacted a credit counseling agency for help? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is any borrower the surviving spouse of a deceased service member who was on active duty at the time of death? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Counselors Name: <u>Hired a consultant Short Sale. Will contact you</u>	Counselors Phone Number: _____
Agency's Name: _____	Counselors Email Address: _____
Has the mortgage on your principal residence ever had a Home Affordable Modification Program (HAMP) trial period plan or other permanent modification? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Has any property that you or any Co-Borrower own had a permanent HAMP modification? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", how many: _____	
Are you or any Co-Borrower currently in or being considered for a HAMP trial period plan on a property other than your principal residence? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

TO: National Bankruptcy Services

RE: Client Specialized Loan Servicing, LLC
Debtors Jacqueline Kushner
Case No.: 18-33285
Loan No.: xxxxxx5749
Our File No. 4128-N-1130
Property Address: 731 Greens Ave
Long Branch, New Jersey 07740

By signing below and proceeding with the loss mitigation process, the undersigned hereby agree and further consent to the following:

Please check one:

- ☒ I hereby authorize agents of your firm and/or agents of Specialized Loan Servicing, LLC and/or agents of the servicer of the subject loan to communicate directly with the debtor. Such communications shall be restricted to the subject matter of a workout or loss mitigation alternatives.
- ☐ Although I am interested in the loss mitigation alternatives, I would prefer that all communications be directed through the attorney's office.
- ☐ I am not interested in pursuing a loss mitigation alternative.

Please check one:

- ☒ I hereby authorize Specialized Loan Servicing, LLC, upon successful approval of a loan modification, to file for court approval of the loan modification.
- ☒ Upon successful approval of a loan modification, it is the intent of my client to voluntarily dismiss the bankruptcy.

Date: 2/28, 2019

CONSENTED TO:


Debtor's Attorney Signature


Debtor

Debtors Phone Number

Larry Kushner
Debtor - pro se

(732) 670-6703

Fill in this information to identify the case:

Debtor 1 Larry J. Kushner
Debtor 2 Jacqueline Kushner
(Spouse, if filing)
United States Bankruptcy Court for the: _____ District of New Jersey
(State)
Case number 18-33285-CMG

Mortgage Proof of Claim Attachment: Addendum

Additional Claim Itemization:

Loan History Date	Actual Date Incurred	Description	Amount
1/2/2019	11/14/2018	Foreclosure Attorney Fee	\$747.50

POC Special Language:

Specialized Loan Servicing, LLC services the loan on the property referenced in this proof of claim. In the event the automatic stay in this case is modified, this case dismisses, and /or the debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of HSBC Bank USA, National Association, as Trustee for ACE Securities Corp. Home Equity Loan Trust, Series 2006-HE1 Asset Backed Pass-Through Certificates, "NOTEHOLDER". Noteholder is unable to find the promissory note and will seek to prove the promissory note using a lost note affidavit. Noteholder is the original mortgagee or beneficiary or the assignee of the security instrument for the referenced loan.

Exhibit
D

LOST NOTE AFFIDAVIT

PERSONALLY appeared before me, Nathalie Hurth (the "Affiant"), who, upon being duly sworn, states on his/her oath as follows:

1. Affiant is a Vice President Loan Documentation employed by **WELLS FARGO BANK, N.A. DBA AMERICA'S SERVICING COMPANY** ("Wells Fargo"), **Servicer**.
2. I am authorized to make this Affidavit on behalf of **WELLS FARGO BANK, N.A. DBA AMERICA'S SERVICING COMPANY AS SERVICER OF THE LOAN FOR HSBC BANK USA, NATIONAL ASSOCIATION AS TRUSTEE FOR ACE SECURITIES CORP. HOME EQUITY LOAN TRUST, SERIES 2006-HE1, ASSET BACKED PASS-THROUGH CERTIFICATES**. In the regular performance of my job functions, I am familiar with business records maintained by Wells Fargo for the purpose of servicing mortgage loans and I have personal knowledge of the operation of and the circumstances surrounding the preparation, maintenance, and retrieval of records in Wells Fargo's record keeping systems. These records (which include data compilations, electronically imaged documents, and others) are made at or near the time by, or from information provided by, persons with knowledge of the activity and transactions reflected in such records, and are kept in the course of business activity conducted regularly by Wells Fargo. It is the regular practice of Wells Fargo's mortgage servicing business to make these records. I have acquired personal knowledge of all facts set forth in this affidavit by examining these business records.
3. **JACQUELINE KUSHNER** executed and delivered to **FGC COMMERCIAL MORTGAGE FINANCE, DBA FREMONT MORTGAGE ITS SUCCESSORS AND/OR ASSIGNS** a certain Note dated **SEPTEMBER 19, 2005**. The Note was secured by a **MORTGAGE** executed by **JACQUELINE KUSHNER AND LARRY KUSHNER**, the record owner(s) of the property located at **731 GREENS AVE, LONG BRANCH, NEW JERSEY 07740**, dated **SEPTEMBER 19, 2005**, and recorded on **DECEMBER 6, 2005** in **MONMOUTH COUNTY, NEW JERSEY** in or as **BK OR 8521 AND PG 6253 AND/OR INSTRUMENT NUMBER 2005209375**.

Exhibit "E"

4. The subject note has been inadvertently lost, misplaced or destroyed. Affiant states that **WELLS FARGO BANK, N.A. DBA AMERICA'S SERVICING COMPANY AS SERVICER OF THE LOAN FOR HSBC BANK USA, NATIONAL ASSOCIATION AS TRUSTEE FOR ACE SECURITIES CORP. HOME EQUITY LOAN TRUST, SERIES 2006-HE1, ASSET BACKED PASS-THROUGH CERTIFICATES** has not pledged, assigned, transferred, hypothecated or otherwise disposed of the note.

5. **WELLS FARGO BANK, N.A. DBA AMERICA'S SERVICING COMPANY AS SERVICER OF THE LOAN FOR HSBC BANK USA, NATIONAL ASSOCIATION AS TRUSTEE FOR ACE SECURITIES CORP. HOME EQUITY LOAN TRUST, SERIES 2006-HE1, ASSET BACKED PASS-THROUGH CERTIFICATES** has made a diligent and extensive search of its records in a good faith effort to discover the lost note in accordance with its procedures for locating the lost note, without success.

a. The following areas were searched for the lost note:

- i. Reviewed origination file
- ii. Checked internal Wells Fargo vault
- iii. Checked with Custodian
- iv. Checked box storage records
- v. Checked with current and/or prior attorney

6. A copy of subject Note is attached as Exhibit "A."



FURTHER AFFIANT SAYETH NAUGHT.

WELLS FARGO BANK, N.A. DBA
AMERICA'S SERVICING COMPANY AS
SERVICER OF THE LOAN FOR HSBC BANK
USA, NATIONAL ASSOCIATION AS
TRUSTEE FOR ACE SECURITIES CORP.
HOME EQUITY LOAN TRUST, SERIES 2006-
HE1, ASSET BACKED PASS-THROUGH
CERTIFICATES

Sign: Nathalie Humm

Name: Nathalie Humm

Company: WELLS FARGO BANK, N.A. DBA
AMERICA'S SERVICING COMPANY

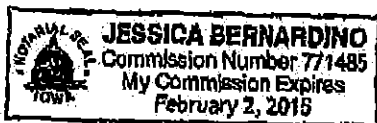
Title: Vice President Loan Documentation

Date: 4.5.2013

State: Iowa

County: Polk

On this 5th day of April, 2013, before me appeared Nathalie Humm
to me personally known, who being duly sworn did say that she/he is the Vice President Loan Documentation
of WELLS FARGO BANK, N.A. DBA AMERICA'S SERVICING COMPANY, a national
banking association, and that said Lost Note Affidavit was signed and sealed on behalf of such association
defined in this document as Servicer and said association acknowledged this instrument to be the free act and
deed of said association.



Jessica Bernardino
Notary Public,

State of Iowa

My Commission expires: 2/2/2015



JACQUELINE KUSHNER
731 GREENS AVE
LONG BRANCH NJ 07740

Loan number: 1017685749
Property address: 731 GREENS AVE
LONG BRANCH NJ 07740

Changes to Your Mortgage Interest Rate and Payment on 04/01/19

Under the terms of your Adjustable-Rate Mortgage (ARM), you had a 006 month period during which your interest rate stayed the same. That period ends on 04/01/19, so on that date your interest rate and mortgage payment change. After that, your interest rate may change every 006 months for the rest of your loan term.

	Current Rate and Monthly Payment	New Rate and Monthly Payment
Interest Rate	9.00000%	9.25000%
Total Monthly Payment	\$6664.63*	\$6745.68 Due 05/01/19

Interest Rate: We calculated your interest rate by taking a published "index rate" and adding a certain number of percentage points, called the "margin". Under your loan agreement, your index rate is the 6 MONTH LIBOR and your margin is 6.47000%. The 6 MONTH LIBOR is published Daily in the WALL STREET JOURNAL.

Rate Limit(s): Your rate cannot go higher than 13.65000% or lower than 7.65000% over the life of the loan. Your rate can change at each change date by no more than 1.50000%.

Payment Limit(s): None

New Interest Rate and Monthly Payment: The table above shows your new interest rate and new monthly payment. Your new payment is based on the 6 MONTH LIBOR, your margin 6.47000%, your loan balance of \$529504.31, and your remaining loan term of 198 months.

Prepayment Penalty: None

SPECIALIZED LOAN SERVICING LLC IS REQUIRED BY FEDERAL LAW TO ADVISE YOU THAT THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

BANKRUPTCY NOTICE - IF YOU ARE A CUSTOMER IN BANKRUPTCY OR A CUSTOMER WHO HAS RECEIVED A BANKRUPTCY DISCHARGE OF THIS DEBT: PLEASE BE ADVISED THAT THIS NOTICE IS TO INFORM YOU OF THE STATUS OF THE MORTGAGE SECURED BY THE SUBJECT

Exhibit
F

PROPERTY. THIS NOTICE CONSTITUTES NEITHER A DEMAND FOR PAYMENT NOR A NOTICE OF PERSONAL LIABILITY TO ANY RECIPIENT HEREOF, WHO MIGHT HAVE RECEIVED A DISCHARGE OF SUCH DEBT IN ACCORDANCE WITH APPLICABLE BANKRUPTCY LAWS OR WHO MIGHT BE SUBJECT TO THE AUTOMATIC STAY OF SECTION 362 OF THE UNITED STATES BANKRUPTCY CODE. IF YOU RECEIVED A DISCHARGE OF THE DEBT IN BANKRUPTCY, WE ARE AWARE THAT YOU HAVE NO PERSONAL OBLIGATION TO REPAY THE DEBT. WE RETAIN THE RIGHT TO ENFORCE THE LIEN AGAINST THE COLLATERAL PROPERTY, WHICH HAS NOT BEEN DISCHARGED IN YOUR BANKRUPTCY, IF ALLOWED BY LAW AND/OR CONTRACT. IF YOU HAVE QUESTIONS, PLEASE CONTACT US AT 1-800-306-6057.

* Please be aware that the above information does not include any optional product premium.

Specialized Loan Servicing LLC
8742 Lucent Boulevard
Suite 300
Highlands Ranch, CO 80129

JACQUELINE KUSHNER
731 GREENS AVE

LONG BRANCH NJ 07740

Fill in this information to identify the case:

Debtor 1 Larry J. Kushner
Debtor 2 Jacqueline Kushner
(Spouse, if filing)
United States Bankruptcy Court for the: _____ District of New Jersey
(State)
Case number 18-33285-CMG

Official Form 410S1

Notice of Mortgage Payment Change

12/15

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any changes in the installment payment amount. File this form as a supplement to your proof of claim at least 21 days before the new payment amount is due. See Bankruptcy Rule 3002.1.

Name of creditor: HSBC Bank USA, National Association, as
Trustee for ACE Securities Corp. Home Equity
Loan Trust, Series 2006-HE1 Asset Backed Pass-
Through Certificates as Serviced by Specialized
Loan Servicing, LLC

Court claim no. (if known): 12-1

Last four digits of any number you use to identify the debtor's account: _____

5749

Date of payment change:
Must be at least 21 days after date of 05/01/2019
this notice

New total payment:
Principal, interest, and escrow, if any \$6,745.68

Part 1: Escrow Account Payment Adjustment

1. Will there be a change in the debtor's escrow account payment?

☒ No

☐ Yes. Attach a copy of the escrow account statement prepared in a form consistent with applicable nonbankruptcy law. Describe the basis for the change. If a statement is not attached, explain why:

Current escrow payment: \$ _____ New escrow payment: \$ _____

Part 2: Mortgage Payment Adjustment

2. Will the debtor's principal and interest payment change based on an adjustment to the interest rate on the debtor's variable-rate account?

☐ No

☒ Yes. Attach a copy of the rate change notice prepared in a form consistent with applicable nonbankruptcy law. If a notice is not attached, explain why:

Current interest rate: 9.0000% New interest rate: 9.2500%

Current principal and interest payment \$5,142.55 New principal and interest payment: \$5,223.60

Part 3: Other Payment Change

3. Will there be a change in the debtor's mortgage payment for a reason not listed above?

☒ No

☐ Yes. Attach a copy of any documents describing the basis for the change, such as a repayment plan or loan modification agreement. (Court approval may be required before the payment change can take effect.)

Reason for change: _____

Current mortgage payment: \$ _____ New mortgage payment: \$ _____

Exhibit G

Debtor 1

Larry J. Kushner
First Name Middle Name Last Name

Case Number (if known) 18-33285-CMG

Part 4: Sign Here

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.
Check the appropriate box.

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

☒ /s/ Mukta Suri

Signature

Date 03/08/2019

Print:

Mukta Suri

First Name

Middle Name

Last Name

Title

Authorized Agent for Specialized Loan Servicing, LLC

Company

Bonial & Associates, P.C.

Address

14841 Dallas Parkway, Suite 425
Number Street

Dallas, Texas 75254
City State Zip Code

Contact phone

(972) 643-6600

Email

POCInquiries@BonialPC.com